

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE DOW

MAGISTRATE JUDGE COLE

UNITED STATES OF AMERICA

v.

ROBERTA J. PAGE

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No.

14CR

243

Violations:

Title 18, United States Code,
Sections 287 and 641

FILED

COUNT ONE

APR 30 2014

The SPECIAL MARCH 2013 GRAND JURY charges:

THOMAS G BRUTON
CLERK, U S DISTRICT COURT

1. At times material to this Indictment:

a. The Internal Revenue Service was an agency of the United States Department of Treasury and, among other things, was responsible for administering the tax laws of the United States and collecting income taxes from individuals and entities. Taxpayers who were entitled to a refund of federal individual income taxes could claim that refund by submitting a U.S. Individual Form 1040A to the IRS.

b. Form 1040A required the taxpayer to provide, among other information, the taxpayer's name and address, social security number, total income for the tax year, the amount of federal income tax withheld during the tax year, the amount of federal income tax, and the amount of tax due or refund claimed.

c. The IRS relied upon information from the Form 1040A in determining and issuing refunds. After receiving this information, the IRS issued a refund to the taxpayer if there were no outstanding tax liabilities or other federally authorized deductions on record with the IRS.

d. Defendant ROBERTA J. PAGE maintained a bank account in her name at Marquette Bank, located in the Northern District of Illinois.

2. On or about May 5, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERTA J. PAGE,

defendant herein, made, presented, and caused to be presented to the IRS, an agency of the United States Department of Treasury, a claim upon and against the IRS, that is, a United States Treasury check dated May 1, 2009, made payable in the amount of \$162,496 to ROBERTA J. PAGE, which check constituted a federal income tax refund for the year 2007 and which defendant ROBERTA J. PAGE negotiated and caused the negotiation of at Marquette Bank, knowing that the claim was false, fictitious, and fraudulent;

In violation of Title 18, United States Code, Section 287.

COUNT TWO

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about May 5, 2009, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERTA J. PAGE,

defendant herein, did steal, purloin, and knowingly convert and cause to be converted to her own use money of the United States, namely, approximately \$162,496 in funds administered by the Department of Treasury in the form of a federal income tax refund negotiated at Marquette Bank, which funds defendant was not entitled to receive;

In violation of Title 18, United States Code, Section 641.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY